

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Oren J. Warshavsky
Elyssa S. Kates

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

Adv. Pro. No. 10-04517 (SMB)

TRUSTEE'S REQUEST FOR JUDGMENT BY DEFAULT

To: CLERK OF THE COURT
UNITED STATES BANKRUPTCY COURT

Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Baker & Hostetler LLP, respectfully requests that the Clerk of the Court issue a Judgment by Default against Defendant Robert Salem, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure, made applicable to the Adversary Proceeding by Rule 7055(b)(1) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule for the Southern District of New York 7055-2(a), for failure to plead or otherwise defend the above-captioned action as it fully appears from the Court file and from the attached Affidavit.

WHEREFORE, the Trustee respectfully requests that this Court grant the Trustee's Request for Judgment by Default in its entirety and provide for such other relief as this Court deems just and proper.

Dated: New York, New York
March 31 2017

Respectfully submitted,

/s/ Elyssa Kates

David J. Sheehan

Email: dsheehan@bakerlaw.com

Oren J. Warshavsky

Email: owarshavsky@bakerlaw.com

Elyssa Kates

Email: ekates@bakerlaw.com

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Fax: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the following was served this 31st day of March, 2017 by electronic mail and First Class mail upon the following:

/s/ Elyssa Kates
*An Attorney for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of
Bernard L. Madoff*

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Oren J. Warshavsky
Elyssa S. Kates

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04517 (SMB)

AFFIDAVIT FOR JUDGMENT BY DEFAULT

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss.:

Elyssa S. Kates being duly sworn, deposes and states:

1. I am a member of the Bar of this Court and am associated with the firm of Baker & Hostetler LLP, attorneys for Irving H. Picard (“Trustee”), Trustee for the substantively consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the estate of Bernard L. Madoff, and I am familiar with the facts and circumstances in this action.

2. I make this affidavit pursuant to Rule 7055-2(a) of the Local Rules of the Bankruptcy Court for the Southern District of New York, in support of the Trustee’s application for entry of a default judgment against defendant Robert Salem (the “Defendant”).

3. This action is an adversary proceeding commenced before the same Court before which the main underlying SIPA proceeding, No. 08-01789 (SMB) (the “SIPA Proceeding”), is pending. The SIPA Proceeding was originally brought in the United States District Court for the Southern District of New York as *Securities and Exchange Commission v. Bernard L. Madoff Investment Securities LLC et al.*, No. 08 CV 10791, and has been referred to this Court. This Court has jurisdiction over this adversary proceeding under 28 U.S.C. § 1334(b) and 15 U.S.C. §§ 78eee(b)(2)(A), (b)(4). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (H), and (O).

4. On March 24, 2011, the Trustee, in accordance with Bankruptcy Rule 7004(b) of the Federal Rules of Bankruptcy Procedure, timely served the Summons and Complaint upon the Defendant. *See* Dkt. No. 6. An Affidavit of Service evidencing proper and timely service was

filed with the Court. Dkt. No. 6. A true and correct copy of the Affidavit of Service is attached hereto as Exhibit 1.

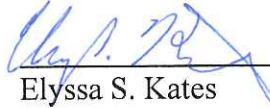
5. The Defendant has not answered the Complaint, and the time for Defendant to answer the Complaint has expired. *See* Dkt. Nos. 18 and 22. True and correct copies of the Trustee's Request to Enter Default and the Entry of Default obtained pursuant to Local Bankruptcy Rule 7055-1 are attached hereto as Exhibits 2 and 3 respectively.

6. The Complaint in this adversary proceeding asserted claims pursuant to sections 78fff(b), 78fff-1(a) and 78fff-2(c)(3) of the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III, sections 105(a), 544, 548(a), 550(a), and 551 of the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, and other applicable law, seeking the avoidance and recovery of \$2,216,994 in connection with certain transfers of property by BLMIS to or for the benefit of Defendant. The Trustee is seeking judgment in the principal amount of \$2,216,994, which is justly due and owing under the present state of the law, and no part of which has been paid.

7. Attached hereto as Exhibit 4 is a true and correct copy of the Affidavit of Service reflecting proper service of the Clerk's Entry of Default on Defendant on September 22, 2014. The Affidavit of Service was filed with the Court on September 22, 2014. *See* Dkt. No. 24.


8. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated: New York, New York
March 31, 2017



Elyssa S. Kates

Sown to before me this 31
day of March, 2017.



Notary Public

Angeline Chan
Notary Public, State of New York
No. 01CH6292789, Qualified in Kings County
Certificate Filed in New York County
Commission Expires November 4, 2017

EXHIBIT 1

Name of Deponent: C J Teague
No. of Affidavit: 1
Exhibit No: "A"
Date Sworn: 21 April 2011

UNITED STATES BANKRUPTCY COURT
Southern District of New York

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.
BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

Case No. 09-11893 (BRL)

IRVING H. PICKARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

Adv. Pro. No. 10-04517 (BRL)

v.

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

WITNESS STATEMENT OF SERVICE

That I, Ciaran James Teague of Assist Group Limited, Conbar House, Mead Lane, Hertford,

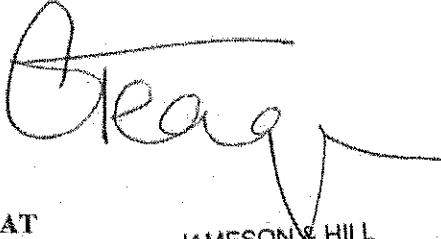
Herts SG13 7AP, a Process Server and not party to these proceedings, make Oath and say as follows:-

1. Unless I have indicated otherwise, the statements I make are within my own knowledge and are true.
2. That I am a person instructed on behalf of Baker Hostetler, Counsel for Irving Pickard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and that I am over 18 years of age.
3. That I did on Thursday the 24th day of March 2011 at 1.13pm personally serve Robert D. Salem, who identified himself, with the following documents by handing the same personally to Robert D. Salem at 5 Vigo Street, London W1S 3HB:

- Summons and Notice of Pretrial Conference in an Adversary Proceeding, dated March 7, 2011
- Complaint, dated November 12, 2010, along with relevant exhibits
- Notice of Applicability of the Order Approving Litigation Case Management Procedures for Avoidance Actions, dated November 12, 2010
- Cover Letter from Counsel for Irving Picard, dated November 12, 2010
- Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order, dated November 10, 2010
- Third Amended Notice of Omnibus Avoidance Action Hearing Dates, dated February 16, 2011

4. A copy of the legal complaint, called the "Avoidance Action" and accompanying papers are now produced and shown to me marked "A".

SIGNED



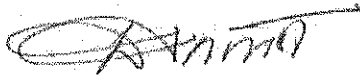
Ciaran James Teague

SWORN AT

JAMESON & HILL
72-74 Fore Street
Hertford SG14 1BY

THIS 21 DAY OF April 2011

BEFORE ME



A SOLICITOR / COMMISSIONER FOR OATHS

DANIEL DARWISH
SOLICITOR
JAMESON AND HILL
72-74 FORE STREET
HERTFORD
SG14 1BY

Name of Deponent: CJ Teague
No. of Affidavit: 1
Exhibit No: "A"
Date Sworn: 21 April 2011

UNITED STATES BANKRUPTCY COURT
Southern District of New York

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.
BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

Case No. 09-11893 (BRL)

IRVING H. PICKARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

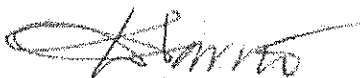
Adv. Pro. No. 10-04517 (BRL)

v.

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

This is the exhibit marked "A" referred to in the Affidavit of Ciaran James Teague sworn before
me this 21 day of April 2011



Solicitor / Commissioner for Oaths

DANIEL DARWISH
SOLICITOR
JAMESON AND HILL
72-74 FORE STREET
HERTFORD
SG14 1BY

EXHIBIT 2

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Oren Warshavsky
Marc E. Hirschfield
Nicholas J. Cremona
Jessie A. Kuhn
Jessica Schichnes
Lindsey A. Shoshany

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04517 (SMB)

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

TRUSTEE'S REQUEST TO ENTER DEFAULT

To: CLERK OF THE COURT
UNITED STATES BANKRUPTCY COURT

Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Baker & Hostetler LLP, respectfully requests that the Clerk of the Court issue a Certificate of Default against defendants Radcliff Investments Limited, Rothschild Trust Guernsey Limited, and Robert D. Salem, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, made applicable to this Adversary Proceeding by Rule 7055 of the Federal Rules of Bankruptcy Procedure, for failure to plead or otherwise defend the above-captioned action as it fully appears from the Court file and from the attached Affidavit.

WHEREFORE, the Trustee respectfully requests that this Court grant the Trustee's Motion in its entirety and provide for such other relief as this Court deems just and proper.

Dated: New York, New York
September 17, 2014

Respectfully submitted,

/s/ Marc E. Hirschfield

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Oren Warshavsky

Email: owarshavsky@bakerlaw.com

Marc E. Hirschfield

Email: mhirschfield@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Jessie A. Kuhn

Email: jkuhn@bakerlaw.com

Jessica Schichnes

Email: jschichnes@bakerlaw.com

Lindsey A. Shoshany

Email: lshoshany@bakerlaw.com

*Attorneys for Irving H. Picard, Esq., Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
And Bernard L. Madoff*

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Oren Warshavsky
Nicholas J. Cremona
Jessie A. Kuhn
Jessica Schichnes
Lindsey A. Shoshany

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RADCLIFF INVESTMENTS LIMITED,

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04517 (SMB)

ROTHSCHILD TRUST GUERNSEY LIMITED,
and ROBERT D. SALEM,

Defendants.

AFFIDAVIT SUPPORTING ENTRY OF DEFAULT

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Lindsey A. Shoshany, being duly sworn, hereby attests as follows:

1. I am a member of the Bar of this Court and an attorney at the firm of Baker & Hostetler LLP, which is counsel for Irving H. Picard ("Trustee"), Trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* ("SIPA") and the estate of Bernard L. Madoff, individually.

2. On November 30, 2010, the Trustee commenced this adversary proceeding by filing a complaint (the "Complaint") against Radcliff Investments Limited, Rothschild Trust Guernsey Limited, and Robert D. Salem ("Defendants"). (Dkt. No. 1.) The Complaint asserted claims pursuant to sections 78fff(b), 78FFF-1(a) and 78fff-2(c)(3) of SIPA, sections 105(a), 544, 548(a), 550(a), and 551 of the United States Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.*, and other applicable law, seeking the avoidance and recovery of transfers in connection with certain transfers of property by BLMIS to or for the benefit of Defendants. (*Id.*).

3. On March 7, 2011, the Clerk of this Court issued a summons upon Defendants. (Dkt. No. 4.)

4. On May 24, 2011, the Trustee, in accordance with Bankruptcy Rule 7004(b) of the Federal Rules of Bankruptcy Procedure, timely served the Summons and Complaint upon Robert D. Salem. (*See* Dkt. No. 6). An Affidavit of Service evidencing proper and timely service was filed with the Court. (*See* Ex. A, Affidavit of Service; Dkt. No. 6).

5. On March 25, 2011, the Trustee, in accordance with Bankruptcy Rule 7004(b) of the Federal Rules of Bankruptcy Procedure, timely served the Summons and Complaint upon Radcliff Investments Limited. (*See* Dkt. No. 5.) An Affidavit of Service evidencing proper and timely service was filed with the Court. (*See* Ex. A, Affidavit of Service; Dkt. No. 5.)

6. On May 28, 2011, the Trustee, in accordance with Bankruptcy Rule 7004(b) of the Federal Rules of Bankruptcy Procedure, timely served the Summons and Complaint upon Rothschild Trust Guernsey Limited. (*See* Dkt. No. 7). An Affidavit of Service evidencing proper and timely service was filed with the Court. (*See* Ex. A, Affidavit of Service, Dkt. No. 7).

7. Pursuant to the Order (1) Establishing Litigation Case Management Procedures For Avoidance Actions And (2) Amending The February 16, 2010 Protective Order governing the litigation of certain avoidance actions, including this adversary proceeding, the time by which Defendants may answer or otherwise move with respect to the Complaint was set to expire May 6, 2011. (*See* Dkt. No. 4.)

8. On September 7, 2011, the Trustee and Radcliff Investments Limited and Rothschild Guernsey Trust Limited stipulated and agreed that the time by which Radcliff Investments Limited and Rothschild Guernsey Trust Limited may answer or otherwise

respond to the Complaint would be November 7, 2011. The Trustee filed a Notice of Extension with this Court on September 7, 2011. (*See* Dkt. No. 8.)

9. On November 18, 2011, the Trustee and Radcliff Investments Limited and Rothschild Guernsey Trust Limited stipulated and agreed that the time by which Radcliff Investments Limited and Rothschild Guernsey Trust Limited may answer or otherwise respond to the Complaint would be January 23, 2012. The Trustee filed a Notice of Extension with this Court on November 22, 2011. (*See* Dkt. No. 9).

10. On January 23, 2012, the Trustee and Radcliff Investments Limited and Rothschild Guernsey Trust Limited stipulated and agreed that the time by which Radcliff Investments Limited and Rothschild Guernsey Trust Limited may answer or otherwise respond to the Complaint would be February 24, 2012. The Trustee filed a Notice of Extension with this Court on January 27, 2012. (*See* Dkt. No. 10).

11. Despite being duly served with the Summons and Complaint, and Radcliff Investments Limited and Rothschild Guernsey Trust Limited being given extensions to answer or otherwise respond to the Complaint, Defendants did not file an answer, move, or otherwise respond to the Complaint.

12. Certain Defendants are business entities and therefore are neither infants nor incompetents. Additionally, upon information and belief, Robert D. Salem is neither an infant nor incompetent.

13. Moreover, because certain Defendants are business entities, the protections afforded under the Servicemember's Civil Relief Act of 2003 should not apply. Furthermore, on September 17, 2014, I performed a search on the Department of Defense Manpower Data Center (DMDC). Upon searching the information data banks of DMDC,

the DMDC does not possess any information indicating that Robert D. Salem is currently on active duty as to all branches of the Military.

14. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

/s/ Lindsey A. Shoshany
Lindsey A. Shoshany

Sworn to before me this
18th day of September, 2014

/s/ Sonya M. Graham
Notary Public
Sonya M. Graham
Notary Public, State of New York
No. 01GR6133214
Qualified in Westchester County
Commission Expires: Sept.12, 2017

EXHIBIT 3

UNITED STATES BANKRUPTCY COURT
Southern District of New York

In re: Administrative Case Re: 08-1789 (Securities Invest

Bankruptcy Case No.:
08-99000-smb

Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff

Plaintiff(s),

--against--

Adversary Proceeding No.
10-04517-smb

Radcliff Investments Limited
Rothschild Trust Guernsey Limited
Robert D. Salem

Defendant(s)

ENTRY OF DEFAULT

It appears from the record that the following defendant failed to plead or otherwise defend in this case as required by law.

Name:	Robert D. Salem
-------	-----------------

Therefore, default is entered against the defendant as authorized by Bankruptcy Rule 7055.

Dated: 9/18/14

Vito Genna

Clerk of the Court

By: /s/ Greg White

Deputy Clerk

EXHIBIT 4

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Oren Warshavsky
Marc E. Hirschfield
Nicholas J. Cremona
Jessie A. Kuhn
Jessica Schichnes
Lindsey A. Shoshany

*Attorneys for Irving H. Picard, Esq., Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiffs,

v.

RADCLIFF INVESTMENTS LIMITED,
ROTHSCHILD TRUST GUERNSEY LIMITED,
AND ROBERT D. SALEM,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04517 (SMB)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, **Sarah B. Roberts**, being duly sworn, depose and say: I am more than eighteen years old and not a party to this action. My business address is Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, NY 10111.

On September 22, 2014, I served the *Clerk's Entry of Default against Robert D. Salem* by placing true and correct copies thereof in sealed packages designated for regular mail and by overnight delivery to the party as set forth on the attached Schedule A.

/s/ Sarah B. Roberts

SARAH B. ROBERTS

Sworn to before me this
22nd day of September, 2014

/s/ Sonya M. Graham

Notary Public

Sonya M. Graham

Notary Public, State of New York

No. 01GR6133214

Qualified in Westchester County

Commission Expires: Sept.12, 2017

Pg 3 of 3
SCHEDULE A

Robert D. Salem
London, W1S 3HB
England
Pro Se